

# ANTI-BRIBERY AND CORRUPTION POLICY



K999 is an integrated, multidisciplinary fabrication, construction and engineering services provider to the Energy, Resources, Infrastructure, Chemical and Processing sectors.

K999 is committed to conducting its business and activities with integrity. K999 prohibits bribery and corruption in any form, whether direct or indirect, whether in the private or public sector.

To achieve this objective, K999:

- Will not engage in corrupt business practices.
- Has implemented measures to prevent bribery and corruption by any officer, employee and Third Parties (including contractors) representing K999.
- Will, at a minimum, comply will all legislation that relates to bribery and corruption as well as any relevant industry standards.

Compliance with this Policy is mandatory. Penalties may be imposed by legislation on K999, its officers and employees, and Third Parties (including contractors) representing K999 for non-compliance with anti-bribery and corruption measures. Further, any breach of this Policy or legislation may result in the termination of your employment or contract with K999.

This policy is supported by the Anti-Bribery and Corruption Procedure and K999's Code of Conduct which must also be complied with.

Examples of conduct that may amount to bribery and/or corruption and therefore be a breach of this Policy include:

- Not paying for goods or services provided to K999.
- Paying a price for goods or services provided to K999 that is greater than the fair market value of the goods or services received which benefits any K999 employee.
- Making facilitation payments.
- Giving or receiving gifts and entertainment that go beyond common courtesies associated with general commercial practice.
- Acting on hiring, contracting or subcontracting recommendations from Government Officials or Foreign Public Officials without complying with K999's standard hiring, contracting or subcontracting criteria.
- Not disclosing a conflict of interest.
- Making any unauthorised cash transactions.

These examples are not exhaustive. All of K999's officers and employees and Third Parties (including contractors) must be vigilant and ensure they do not engage in conduct that amounts to bribery and/or corruption.

All of K999's officers and employees and Third Parties (including contractors) must report any conduct that may be bribery and/or corruption. The process for reporting such conduct is set out in the Whistleblowing Procedure. Employees will not face any adverse consequences when refusing to engage in bribery or corruption and in reporting any suspected instances of bribery or corruption.

For further information please contact your Manager, Financial Officer or HR Manager.

Dennis Hockin

A handwritten signature in blue ink, appearing to read 'Dennis Hockin', is written over a light blue horizontal line.

Managing Director  
K999 Engineering & Construction Co., Ltd.  
March 2023